

October 11, 2007

Michelle Lee Grant
Senior Campaign Finance Analyst
Reports Analysis Division

Identification Number: C00431619

Reference: Amended July Quarterly Report (4/1/07-6/30/07), received 8/15/07

Dear Ms. Grant:

In response to your letter dated September 11, 2007 on C00431619, we would like to clarify the following items:

1. Please amend your report to show election cycle-to-date figures for all aggregate amounts.

We have made appropriate corrections to show the aggregate election cycle-to-date figures.

2. Some of the contributions itemized on Schedule A of your report appear to have incorrect values in the Election Cycle-to-Date field. Please review your procedures for compliance with this requirement and amend your report(s) as necessary. Incorrect aggregate election cycle to date totals for contributors listed on your report include

We continue to work with our software vendor to remedy this problem. The instances that you enumerated in your letter have been corrected by merging appropriate duplicated files to show the true aggregate through June 30. The totals as calculated by the FEC should be reflected in all cases with the following exceptions:

Donald Brenholt, after combining all duplicated files for Mr. Brenholt, the aggregate through June 30 now totals \$1,375.00.

Luther Bridges, after combining all duplicated files for Mr. Bridges, the aggregate through June 30 now totals \$1,150.00.

William Eugene Brooks, after combining all duplicated files for Mr. Brooks, the aggregate through June 30 now totals \$600.00.

Greg Campbell, after combining all duplicated files for Mr. Campbell, the aggregate through June 30 now totals \$1,000.00.

Dr. Quentin E. Krafka, after combining all duplicated files for Dr. Krafka, the aggregate through June 30 now totals \$4,025.00. Appropriate action is in process to bring Dr. Krafkas contributions in line with federal limitations.

Mark Powell, the FEC totals include figures for two different people. Mark R. Powell, Yorba Linda, CA has a total through June 30 of \$780.00; Mark A. Powell, Westminster, CA has a total through June 30 of \$450.00.

Barbara Quicks contributions added to the original \$250.00. An additional \$300.00 was contributed by the California Coalition for Immigration Reform, signed by B. Quick. The entry for the California Coalition for Immigration Reform has been corrected to properly allocate the contribution.

Richard Smiths contributions, according to records reviewed, add to \$300.00. The other contributions are from different

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individuals.

Any adjustments enumerated above which result in exposing a contribution in excess of the federal limit prompted letters or refunds as appropriate.

3. Please amend your report to provide a Schedule A-P if necessary, or to clarify that for the contributions in question, the aggregate total for the election cycle for each contributor does not exceed \$200.00.

After a review of the contributions in question, it is our belief that the amount shown represents the total contributions of individuals whose aggregate contributions are less than \$200.00 to date, and whose contributions are therefore listed on this line.

4. Your Amended July Quarterly Report, received 8/15/07, discloses a substantial increase in the amount of debts from those disclosed on your original report. Please amend your report to clarify why this additional activity was not provided with your original filing.

The original amounts were not included due to improper coding of data within the software for establishing committee debt and payments received thereon. When the error was discovered, we included the correctly coded entries on the Amended Report.

5. Please amend Schedule B-P of your report to correct the descriptions that do not meet the requirements of the Regulations.

Some consistency was lost in a changeover of personnel performing data entry on this task. This report has been amended with our best effort at clearly showing all expenditures, especially those outlined in your letter. We reviewed those that you felt were unclear, and have made administrative and procedural changes in an attempt to avoid confusion or ambiguity in the future.

6. The committee must make, in addition to the original solicitation, at least one additional written or oral request for the information within 30 days of the receipt of the contribution. A written request may not include an additional solicitation or material on any other subject, other than thanking the contributor for the contribution and must include a pre-addressed post card or envelope for the contributors response. An oral request must be documented in writing.

Regarding the identification of all individuals contributing in excess of \$200, we continue to attempt to obtain this information on our contributors. Our original solicitations include a clear request for the contributor information pursuant to federal law; we have instituted a best efforts procedure whereby any contribution received that does not have complete information will receive a follow-up; follow-ups on all individuals with currently missing information are approached again with no solicitation, and include an addressed return envelope, as required. Information obtained through phone calls has been and is documented in writing. This is an ongoing process and we receive these updates continually.

We believe that we have addressed or are in the process of addressing all the concerns you expressed in your letter.

Please let us know if you require further information.

Sincerely,

Steven J. Durham, Treasurer
Tancredo for President
